

7/27/2020 4:44 PM

ERIN CARTWRIGHT WEINSTEIN

Clerk of the Circuit Court

Lake County, Illinois

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS**

SARINA ERVIN,)	
)	
Petitioner,)	
)	
vs.)	Case No. 04 D 1943
)	
RAYMOND ERVIN,)	
)	
Respondent.)	

**AFFIDAVIT OF PETITIONER'S COUNSEL IN SUPPORT OF
AFFIRMATIVE REQUEST FOR SUPREME COURT RULE 137 SANCTIONS**

Your affiant, Jonathan D. Steele, being first duly sworn upon oath deposes and states as follows

1. I am the attorney primarily responsible for the representation of the Petitioner in the above-captioned matter.
2. I have reviewed the billing entries within our firm's billing system and have set forth in the chart below the charges related to the defense of the motion to quash filed by Gwendolyn Barlow on February 26, 2020.

Date	Service	Individual	Rate	Time	Charge
6/18	Receipt, review and transmittal of emergency motion to continue hearing, preparation of argument re: same	JDS	\$400	.5	\$200.00
6/19	Preparation for hearing on contempt and citations and attendance at same	JDS	\$400	1	\$400.00
7/15	Court appearance regarding hearing on petition for rule Zeit and status of setting hearing on other matters. Draft order memorializing hearing.	JDS	\$400	1	\$400.00
7/20	Draft response to newest motion to quash. Research regarding res judicata/estoppel of oft-repeated frivolous/rejected claims. Conference with Matt Elster regarding divestment of jurisdiction during pendency of jurisdictionless appeals. Review of case law regarding same.	JDS	\$400	2	\$800.00
7/20	Strategy conference with JDS regarding next steps in case and upcoming court appearance	MDE	\$425	.5	\$212.50
7/21	Prepare Exhibits for Response to Motion	SAB	\$175	.35	\$61.25
7/21	Conference with Matt Elster regarding appellate timeline (.5) and compiling of supporting record and	JDS	\$400	1.5	\$600.00

	procedural timeline (.75). Receipt, review and transmittal of motion to continue hearing, draft notes of argument for same (.25).				
7/21	Follow up conference with JDS regarding events in court, potential appealability of orders, and strategy regarding next steps	MDE	\$425	.5	\$212.50
7/22	Court appearance regarding hearing on motion to quash citation. Conference with EJM and Elster post-court. Drafting of order memorializing rulings. Emails with client and court admin regarding order to be entered and next court date.	JDS	\$400	1	\$400.00
7/22	Conf with JDS re: court appearance and Rule 137 sanctions	EJM	\$600	.35	\$210.00
7/27	Review of billing and preparation of affidavit in support of 137 sanctions.	JDS	\$400	.25	\$100.00
7/29	Court appearance regarding continued hearing on 137 Sanctions	JDS	\$400	TBD	TBD
			Total	8.7	\$3,596.25

3. The initials JDS are mine. EJM refers to Enrico J. Mirabelli, an equity partner at our firm.

MDE refers to Matthew Elster, a partner at our firm. SAB refers to Sara Boucher, a paralegal at our firm.

4. If called upon to testify to the facts set forth in this affidavit, I could do so from my own personal knowledge.

Further affiant sayeth naught.



Jonathan D. Steele

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